

REMARKS

In the March 20, 2008 Office Action, claims 1-10 stand rejected in view of prior art. No other objections or rejections were made in the Office Action.

Status of Claims and Amendments

In response to the March 20, 2008 Office Action, Applicants have amended claims 1 and 4-6, and added new claim 11, as indicated above. Thus, claims 1-11 are pending, with claims 1 and 4-6 being the only independent claims. Reexamination and reconsideration of the pending claims are respectfully requested in view of above amendments and the following comments.

Interview Summary

On June 9, 2008, the undersigned conducted a personal interview with Examiner Phu K. Nguyen, who is in charge of the above-identified patent application. Applicants wish to thank Examiner Nguyen for the opportunity to discuss the above-identified patent application during the Interview of June 9, 2008.

Rejections - 35 U.S.C. § 102

In pages 2-6 of the Office Action, claims 1, 4-10 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. JP07-244747 (Ikefuchi (, Toru)). In response, Applicants have amended independent claims 1, 4, 5, and 6 to clearly define the present invention over the prior art of record.

In particular, Applicants have amended claim 1 to recite code for ***annularly*** moving a camera viewpoint, in accordance with the operation, with respect to a reference point ***as a center***, where the reference point is selected from at least two points on a straight line linking a first object and a second object among the plurality of objects.

Ikefuchi was cited in the Office Action to show code for receiving an operation, code for moving a camera viewpoint, code for displaying a camera image. However, Applicants respectfully assert that Ikefuchi's camera view point does not annularly move with a reference point as a center, and that the reference point is not selected.

Applicants respectfully assert that this structure is *not* disclosed or suggested by Ikefuchi or any other prior art of record. It is well settled under U.S. patent law that for a reference to anticipate a claim, the reference must disclose each and every element of the claim within the reference. Therefore, Applicants respectfully submit that claim 1, as now amended, is not anticipated by the prior art of record. Withdrawal of this rejection is respectfully requested.

Moreover, Applicants believe that the dependent claims 8-10 are also allowable over the prior art of record in that they depend from independent claim 1, and therefore are allowable for the reasons stated above. Also, the dependent claims 8-10 are further allowable because they include additional limitations. Thus, Applicants believe that since the prior art of record does not anticipate the independent claim 1, neither does the prior art anticipate the dependent claims.

As claims 4-6 similarly recite, Applicants respectfully assert that claims 4-6 are also allowable for the same or similar reasons stated above.

Applicants respectfully request withdrawal of the rejections.

Rejections - 35 U.S.C. § 103

On pages 6-8 of the Office Action, claims 2 and 3 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ikefuchi in view of EA Sports (Tiger Woods PGA Tour 2002). In response, Applicants have amended independent claim 1, as mentioned above.

Applicants respectfully assert that Ikefuchi is different from the present invention, as described above. EA Sports was cited in the Office Action to show that the operation reception function determines a tilt direction, and receives a camera viewpoint height operation. Applicants respectfully assert that EA Sports is silent with regards to code for annularly moving the camera viewpoint, in accordance with the operation, with respect to the reference point as a center, where the reference point is selected from at least two points on the straight line linking the first object and the second object among the plurality of objects.

It is well settled in U.S. patent law that the mere fact that the prior art can be modified does *not* make the modification obvious, unless the prior art provides an *apparent reason* for the desirability of the modification. Accordingly, the prior art of record lacks any apparent reason, suggestion or expectation of success for combining the patents to create the Applicants' unique arrangement of the computer readable medium.

Applicants believe that the dependent claims 2 and 3 are also allowable over the prior art of record in that they depend from independent claim 1, and therefore are allowable for the reasons stated above. Also, the dependent claims 2 and 3 are further allowable because they include additional limitations. Thus, Applicants believe that since the prior art of record does not disclose or suggest the invention as set forth in independent claim 1, the prior art of record also fails to disclose or suggest the inventions as set forth in the dependent claims.

Therefore, Applicants respectfully request that this rejection be withdrawn in view of the above comments and amendments.

New Claims

Applicants have added new claim 11 by the current Amendment to recite that the reference point is selected by the operator. Applicants respectfully assert that claim 11 is also allowable over the prior art of record in that it depends from independent claim 1, and

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therefore is allowable for the reasons stated above. Also, the dependent claim 11 is further allowable because they include additional limitations. Thus, Applicants believe that since the prior art of record does not disclose or suggest the invention as set forth in independent claim 1, the prior art of record also fails to disclose or suggest the inventions as set forth in the dependent claim.

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In view of the foregoing amendment and comments, Applicants respectfully assert that claims 1-11 are now in condition for allowance. Reexamination and reconsideration of the pending claims are respectfully requested.

Respectfully submitted,

/Akiyoshi Onda/
Akiyoshi Onda
Limited Recognition No. L0336

GLOBAL IP COUNSELORS, LLP
1233 Twentieth Street, NW, Suite 700
Washington, DC 20036
(202)-293-0444
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